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17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**
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20 KHANH NIELSON, individually, and
 21 on behalf of all others similarly
 situated,
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Plaintiffs,
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vs.
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25 THE SPORTS AUTHORITY,
 and DOES 1 through 100, inclusive,
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Defendants.
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) **Case No. CV-11-4724 SBA**

) **CLASS ACTION**

) **STIPULATION AND [PROPOSED] ORDER**
) **CONTINUING CLASS CERTIFICATION**
) **BRIEFING SCHEDULE**

) **Judge: Hon. Sandra Brown Armstrong**

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Plaintiff Khanh Nielson ("Plaintiff") and Defendant TSA Stores, Inc. d/b/a Sports Authority ("Defendant"), by and through their respective counsel of record named herein, hereby stipulate as follows:

WHEREAS, prior to the February 22, 2012 Initial Case Management Conference, the parties agreed to attend private mediation;

WHEREAS, this Court set the following deadlines regarding class certification at the February 22, 2012 Initial Case Management Conference: Motion for Class Certification, September 21, 2012; Opposition to the Motion for Class Certification, October 19, 2012; Reply to Motion for Class Certification, November 7, 2012; and, the hearing on the Motion for Class Certification, December 11, 2012. (*see Dckt No. 18*);

WHEREAS, the earliest date by which mediation can be scheduled with the parties' preferred mediator is July 2012;

WHEREAS, the parties have informally agreed to postpone resolution of outstanding discovery disputes until immediately after the mediation session;

WHEREAS, should mediation prove unsuccessful, the parties will require the completion of substantial written discovery and depositions in preparation for Plaintiff's Motion for Class Certification;

WHEREAS, the parties will have insufficient time to complete such discovery, should mediation fail, under the current briefing schedule;

WHEREAS, there have been no prior modifications to the class certification briefing schedule; and

THEREFORE, the parties, through their undersigned respective counsel, stipulate and request that the Court hereby continue the class certification briefing schedule as follows:

- Motion for Class Certification due: April 19, 2013;
- Opposition to Motion for Class Certification due: May 17, 2013;
- Reply to Opposition to Motion for Class Certification due: June 5, 2013; and
- Hearing on Motion for Class Certification: *To be set by the Court*

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1 **IT IS SO STIPULATED.**

2
3 Dated: April 2, 2012

4 **SCOTT COLE & ASSOCIATES, APC**

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6 By: /s/ Hannah R. Salassi
7 Hannah R. Salassi, Esq.
8 Attorneys for the Representative Plaintiffs
9 and the Plaintiff Class

10 Dated: April 2, 2012

11 **OGLETREE, DEAKINS, NASH,**
12 **SMOAK & STEWART, P.C.**

13 By: /s/ Erica K. Rocush
14 Erica K. Rocush, Esq.
15 Attorneys for Defendant
16 TSA STORES, INC
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[PROPOSED] ORDER

IT IS HEREBY ORDERED that:

The Class Certification briefing schedule is hereby continued as follows:

- Motion for Class Certification due: March 15, 2013;
- Opposition to Motion for Class Certification due: April 12, 2013;
- Reply to Opposition to Motion for Class Certification due: May 1, 2013; and,
- Hearing on Motion for Class Certification: _____, 2013

For good cause shown, **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: _____

The Honorable Sandra Brown Armstrong
United States District Judge

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